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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) CR 12-00834 EMC
14 Plaintiff,) STIPULATION AND [PROPOSED] ORDER
15 v.) EXCLUDING TIME UNDER THE SPEEDY
MONICO DOMINGUEZ,) TRIAL ACT FROM DECEMBER 20, 2012 TO
16 JUAN DOMINGUEZ, JR.,) JANUARY 30, 2013
17 SHAWN GEERNAERT)
18 Defendant.)
19

20 On December 20, 2012, the parties in this case appeared before the Honorable Edward M.
21 Chen for an initial appearance. At that time, the parties represented that the government had just
22 produced to defense counsel a voluminous set of discovery, including multiple CDs worth of
23 video and audio recordings and that the defense would need additional time to review the
24 discovery and to conduct additional investigation. Accordingly, the parties jointly requested an
25 extension of time and stipulated that time should be excluded from December 20, 2012 to
26 January 30, 2013, for effective preparation of defense counsel. The parties represented that
27 granting the continuance was for the reasonable time necessary for effective preparation of
28

1 defense counsel, taking into account the exercise of due diligence. See 18 U.S.C. §
2 3161(h)(7)(A) and (B)(iv).

3 The parties also agreed that the ends of justice served by granting such a continuance
4 outweighed the best interests of the public and the defendants in a speedy trial. See 18 U.S.C. §
5 3161(h)(7)(A).

6
7 IT IS SO STIPULATED:

MELINDA HAAG
United States Attorney

9 DATED: January 29, 2013

/s/
RANDY LUSKEY
Assistant United States Attorney

12 DATED: January 29, 2013

/s/
JAI GOHEL
Attorney for Monico Dominguez

15 DATED: January 29, 2013

/s/
JODI LINKER
Attorney for Juan Dominguez Jr.

18 DATED: January 29, 2013

/s/
JOSEPH STOGNER
Attorney for Shawn Geernaert

21 IT IS HEREBY ORDERED that time is excluded under the Speedy Trial Act from December
22 20, 2012 to January 30, 2013, under 18 U.S.C. § 3161(B)(iv) and 18 U.S.C. § 3161(h)(7)(A).
23

24 IT IS SO ORDERED.
25

26 DATED: 1/31/13
27

28 STIP. & [PROP.] ORDER EXCL. TIME
CR 12-00834 EMC

